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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Patent application of:

) Date: September 17, 2004

Frederick W. Ryan, Jr.

) Attorney Docket No.: F-173

Serial No.: 09/626,954

) Customer No.: 00919

Filed: July 27, 2000

) Group Art Unit: 3629

Confirmation No.: 9430

) Examiner: Richard Sukyoon Woo

Title: **POSTAGE METERING SYSTEM FOR USE WITH BUSINESS REPLY
MAIL**

APPEAL BRIEF

Mail Stop Appeal Briefs - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

The Appellant respectfully submits the following Brief in the appeal of the subject application. The Notice of Appeal was filed on July 19, 2004, following a final Office Action mailed April 20, 2004.

This Appeal Brief is submitted in triplicate.

09/23/2004 HALI11 00000060 161885 09626954

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I. REAL PARTY IN INTEREST

Pitney Bowes Inc., a Delaware corporation, having its principal place of business in Stamford, Connecticut, is the real party in interest by way of assignment from the Appellant.

II. RELATED APPEALS AND INTERFERENCES

None.

III. STATUS OF CLAIMS

- (1) Claims 1-26 and 28-44 are the subject of this Appeal and stand rejected.
- (2) Appellant hereby appeals the rejection of claims 1-26 and 28-44.

IV. STATUS OF THE AMENDMENTS

- (1) Claims 1-19 were filed with the application on July 27, 2000. In an Amendment dated October 25, 2002, claims 1-4, 6-10, and 12-19 were amended, and claims 20-44 were added. In an Amendment dated March 6, 2003, claim 27 was cancelled. In an Amendment dated August 26, 2003, claims 4 and 15 were amended. Finally, in an Amendment dated January 29, 2004, claims 15 and 19 were amended.
- (2) Appendix A attached hereto contains current claims 1-26 and 28-44 on appeal.

V. SUMMARY OF THE INVENTION

The present invention comprises a system of operating a postage meter for printing postage indicia information on a business reply mail piece. Business reply mail is a type of mail piece on which the delivery address has already been pre-printed by the sender. Thus, the recipient can return the mail piece to the sender without needing to print an address on the mailpiece. However, having such a pre-printed address on the mailpiece

makes it difficult for computer-based postage metering systems to comply with current United States Postal regulations. Under those regulations, known as the Information-Based Indicia Program (IBIP), the United States Postal Service (USPS) allows customers to replace traditional stamps with a new “information based” postage indicium that can be generated from a user’s computer. (Page 1, line 25 to page 2, line 13). This information-based postage indicium consists of a human-readable portion and a two-dimensional bar code, both of which are printed directly on the mail piece. (Page 2, lines 22-29). The human-readable portion includes an originating address, an identification of the accounting device, the date of mailing, and postage amount. *Id.* The two-dimensional bar code encodes various information specifically associated with the mail piece, such as the postage amount, originating address, destination delivery point, date of mailing and a digital signature. *Id.* The IBIP requires that for each mail piece, the delivery address and the corresponding postage indicium be generated and printed together as an integral unit, thus to ensure address cleansing and a one-to-one correspondence between the delivery address and the associated postage indicium. (Page 2, line 30 to page 3, line 1). Because of this IBIP requirement, problems exist when a computer-based postage metering system user desires to send a business reply mail piece back to its sender. To comply with the IBIP requirement, a computer-based user would have to print an address over the top of the delivery address pre-printed by the mail sender. Clearly, this is not an acceptable way to solve the problem of complying with the IBIP requirements. To overcome these deficiencies in an acceptable manner, the present invention provides for a system that includes the steps of:

- a) having a mail campaign sender send a delivery address corresponding to a mail campaign to a data center;
- b) generating a registration ID corresponding to the delivery address at the data center;

- c) the data center providing the registration ID to the mail campaign sender;
- d) sending a business reply mail piece with a registration ID from the mail campaign sender to the postage metering system user;
- e) the postage metering system user sending the registration ID to the data center;
- f) generating postage indicium information using the registration ID at the data center;
- g) transmitting the postage indicium information to the postage metering system; and
- h) printing the postage indicium on the business reply mail piece.

(Page 8, line 16 to page 10, line 10).

Thus, the present invention overcomes the disadvantages discussed above, whereby a computer-based postage metering user is now able to use pre-printed business reply mail in compliance with the IBIP regulations.

This Summary is not intended to supplant the description in the claims and the more detailed description in the specification.

VI. ISSUES.

The Rejections

1. Claims 1-2, 4-5, 9-11, 15, 19-20, 28, 34 and 36 stand rejected under 35 USC §103(a) as being rendered obvious by U. S. Patent No. 6,428,218 to Stier, et al. ("Stier '218") in view of U. S. Patent No. 5,612,889 to Pintsov, et al. ("Pintsov '889").
2. Claims 3, 6, 12, 16, 22, 25, 30-31, 39-40 and 42 stand rejected under 35 USC §103(a) as being rendered obvious by Stier '218 and Pintsov '889, and further in view of U. S. Patent No. 6,526,393 to Fredman ("Fredman '393").

3. Claims 7-8, 13-14, 17-18, 21, 23-24, 26, 32-33, 35, 37-38, 41 and 43-44 stand rejected under 35 USC §103(a) as being rendered obvious by Stier '218, Pintsov '889, Fredman '393, and further in view of U. S. Patent No. 6,121,565 to Allott, III ("Allott '565").

Issues for Appeal

1. Do the asserted references satisfy the rule that each of the claimed elements be disclosed or suggested in the asserted reference in order to satisfy obviousness under 35 USC §103?
2. Do the asserted references satisfy the rule that a motivation to combine the elements in the claimed manner must be identified? Has hindsight been improperly used by the Examiner in lieu of identifying a motivation to combine in the asserted prior art in the manner claimed?

VII. GROUP OF CLAIMS

Claims on appeal are grouped in the following manner:

Group 1 - Claims 1-14, 21-26, 28-34, and 39-44.

Group II - Claims 19 and 20.

Group III - Claims 15-18 and 35-38.

None of the claims in different Groups stand or fall together.

VIII. ARGUMENT

- A. The subject matter defined by claims 1-2, 4-5, 9-11, 15, 19-20, 28, 34 and 36 are not rendered obvious by Stier '218 in view of Pintsov '889.

To establish a proper case of obviousness under §103(a), the Examiner must make a *prima facie* showing that the prior art contains some teaching or suggestion of, or motivation for, all the elements of the claimed invention. Thus, it is well settled that the Examiner “bears the initial burden...of presenting a *prima facie* case of unpatentability.” *In re Piasecki*, 223 USPQ 785, 788 (Fed. Cir. 1984); *In re Oetiker*, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992); *In re Rijckaert*, 28 USPQ2d 1955, 1956 (Fed. Cir. 1993).

In rejecting a claim under 35 USC §103, the Examiner is charged with the initial burden for providing a factual basis to support the obviousness conclusion. *In re Warner*, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967); *In re Lunsford*, 375 F.2d 385, 148 USPQ 721 (CCPA 1966); *In re Freed*, 425 F.2d 785, 165 USPQ 570 (CCPA 1970). The Examiner is also required to explain how and why one having ordinary skill in the art would have been led to modify an applied reference and/or combine applied references to arrive at the claimed invention. *In re Ochiai*, 37 USPQ2d 1127 (Fed. Cir. 1995); *In re Deuel*, 51 F.3d 1552, 34 USPQ 1210 (Fed. Cir. 1995); *In re Fritch*, 972 F.2d 1260; 23 USPQ 1780 (Fed. Cir. 1992); *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988). In establishing the requisite motivation, it has been consistently held that both the suggestion and reasonable expectation of success must stem from the prior art itself, as a whole. *In re Ochiai*, supra; *In re Vaeck*, 947 F.2d 4800, 20 USPQ2d 1438 (Fed. Cir. 1991); *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); *In re Dow Chemical Co.*, 837 F.2d 469, 5 USPQ2d 1529 (Fed. Cir. 1988).

It is respectfully submitted that the rejection of these claims should be withdrawn, because the cited references fail to describe or suggest the various elements of the claimed invention. Further, Appellant respectfully submits that the Examiner has misconstrued the teachings of the asserted references as applied to the present invention, and the rejection does not

even meet the threshold burden of presenting a *prima facie* case of unpatentability. For these reasons, Appellant is entitled to a grant of a patent.

As discussed above, the present invention provides for a system of operating a postage meter for printing postage indicia information on a business reply mail piece in compliance with IBIP requirements. To comply with those IBIP requirements, the present invention ensures that there is a one-to-one correspondence between the delivery address on the business reply mail piece and its associated postage indicium. In accordance with one aspect of this invention, this is accomplished by having a method include the steps of having a mail campaign sender transmit a registration ID number to a data center; the registration ID number being associated with a particular delivery address; generating and receiving postage indicium from the data center where the postage indicium information has been generated using the registration ID number and data relating to the delivery address; and printing the postage indicium information on an associated business reply mail piece for delivery to its intended designation.

In the rejections, the Examiner has applied Stier '218 as disclosing a method of operating a data center for generating postage indicium information for use with printing a postage indicium on a business reply mail piece, where the postage metering system receives postage indicium information from a data center. The Examiner acknowledges the deficiencies in Stier '218, especially the fact that Stier '218 does not disclose transmitting a registration ID number that is associated with a delivery address previously defined by the mail campaign sender, and that "any culprit can steal the roll of postage indicium labels, because the indicium labels may not be in any way associated with a specified address. (April 19, 2004, Office Action, page 3, lines 10-20). These missing elements are important parts of the present invention, but other deficiencies exist as well. And the other references relied upon by the Examiner do not cure these deficiencies.

There is absolutely no teaching or suggestion in Stier '219 of applying postage indicium to a business reply mail piece where the postage indicium is generated using a registration ID

number and data relating to the delivery address. Stier '219, in contrast, is directed to a system using self-adhesive special purpose label arrangements for use in printing PC postage onto business courtesy envelopes. (Stier '219, col. 1, lines 17-20). The special purpose label arrangements of Stier '219 are designed for use with mail pieces having facing identification marks (FIMs), which are typically a pattern of vertical bars printed in the upper right area of the front side of a mail piece and to the left of the indicia space, such that the design of the label placed on the envelope or postage indicia printed directly on the envelope does not encroach upon the area reserved for FIM markings. (Stier '219, col. 2, lines 1-17, 55-58).

The mail pieces are described in Stier '219, column 2, lines 61 to column 3, line 2, as:

“Business Courtesy mailings can be referred to as pieces in envelopes that are provided to a user by an outside business for the primary purpose of facilitating that user’s payment of a bill or other response to the business. These mail items are not pre-paid by the business, and have a number of attributes, including the following: The destination address will typically be provided either through a pre-printing on the envelope or by using a windowed envelope that exposes the destination address.”

To mail these business courtesy mail pieces in Stier '219, the user must use postage value that has been obtained from a meter vendor server where “postage value can be obtained in blocks and stored on the user’s computer or a device attached to the computer, or can be downloaded as needed (e.g., 33¢ at a time).” (Stier '219, col. 6, lines 26-28). Nowhere does Stier '219 teach or suggest that these blocks of downloaded postage value are tied in to a specific piece of mail. Instead, Stier '219 only discloses a user contacting a third party central server (meter vendor server) location to download postage value (i.e., replenish funds in its registers) without any connection to a specific mail piece. (Stier '219, col. 1, lines 40-45). This is in direct contrast to the present invention where the postage indicium that is downloaded is associated with a registration ID number and a delivery address to be applied to an associated business reply mail piece, the same mail piece that was used to generate the registration ID number. No such connection between postal indicium and mail piece exists in Stier '219. Furthermore, as

acknowledged by the Examiner, there is no disclosure, teaching or suggestion in Stier '219 of transmitting a registration ID number to a data center, having the data center generate postage indicium information using the registration to a postage metering system, and the postage metering system printing that postage indicium information on an associated piece of business reply mail.

The Examiner's reference to Pintsov '889 does not cure the deficiencies of Stier '219. The Examiner contends that Pintsov '889 teaches a mail processing system that generates and transmits a registration ID which corresponds to the delivery address previously defined by the mail campaign sender, to the data center and concludes that it would have been obvious to generate a registration ID number as taught by Pintsov '889 and to further modify the postage indicium information to employ the registration ID number, for the purpose of providing a high level of security against intercept of transmitted mailing lists, identification numbers, other data communicated between the campaign sender and data center (or other party), and the postage indicium fraud or misuse.

It is respectfully submitted that the Examiner has improperly combined these two references. Pintsov '889 is directed to a mail processing system requiring a mailer to create a mailing list to be submitted to a carrier service for delivery. The mail carrier generates a unique mail piece identifier that is eventually printed on the mail piece. The mailer does not need to transmit this unique identifier to a data center to receive postage indicium information. The mailer simply places the identifier on a mail piece. These mail pieces with the unique identifiers are then submitted by the mailer to the carrier. From this unique identifier, the carrier is able to verify that data associated with the mail piece has been properly processed. Most importantly, these unique identifiers are separate and distinct from the postage indicium, and there is no suggestion or teaching in Pintsov '889 that the unique identifiers are used to generate postage indicium. Pintsov '889 stresses that the postage indicium and unique identifier are separate and distinct at column 10, line 56 to column 11, line 7:

The unique identification number is comprised, for example, of: the mailer's identification 310, the mailpiece count 312, the number of characters in the address 314 (excluding spaces and punctuation marks) and an error correction code 316. Thus, for each mailpiece the following information is printed: the address, the mailer identification number 310, a sequential piece count number 312, the number of characters in the address 314, and an error correction code 316. By using this data a unique identifier is thus associated with each and every address on the mailing identification file 122. The mailing identification file further includes the total postage 318 charged to the mailer as well as the digital signature 320 of the carrier or trusted third party.

The postage indicium and unique identifier are further distinguished in Pintsov '889 at col. 12, lines 5-12:

A mailpiece 104a has printed on it a return address 602 and a delivery address 604. Also printed on the mailpiece is the unique mailpiece identifier, identification number 306, in a machine readable form, in human readable form or in a combination thereof. Additional information may also be imprinted on the mailpiece such as the date as is shown at 606 and/or the postage amount at 608 (emphasis added).

Appellant submits that the Examiner has improperly combined two references with teachings that are in sharp contrast to the present invention; and, although various features are described in the separate references, there is no suggestion to combine the references in the manner recited. In particular, there is no suggestion to combine the references such that the postage indicium appearing on the business reply mail piece of the present invention is generated using a registration ID number and data relating to the delivery address. This claimed feature of the claimed invention solves a problem that is not addressed in any of the asserted references. That problem is operating a postage meter for printing postage indicium information on a business reply mail piece in compliance with the USPS IBIP regulations.

B. The subject matter defined by claims 3, 6, 12, 16, 22, 25, 30-31, 39-40 and 42 are not rendered obvious by Stier '218 and Pintsov '889 in view of Fredman '393.

The Examiner relies on Fredman '393 for a method of mailing that teaches: receiving a subsidy provided by the data center to the shipper or user and providing a notification to the merchant when the mails or goods are posted by the user.

The Examiner's reliance to Fredman '393 does not render the present invention obvious. Appellant further submits that there is no suggestion to combine Fredman '393 with Stier '219 and Pintsov '889 in the manner recited. In characterizing Fredman '393, the Examiner only refers generally to Figures in Fredman '393 and makes conclusory statements concerning its teachings and disclosures without pointing to specific elements of the Figures or Specification. Appellant respectfully submits that the Examiner has failed to meet the burden of stating "the grounds of rejection fully and carefully", as required by MPEP 707.07(d).

Fredman '393 is directed to a time-controlled, pre-paid delivery system where date sensitive postage is already pre-printed on the envelope by the issuer. The recipient does not need to take any steps to obtain postal indicium from a data center which is in direct contrast to the present invention. In fact, Fredman '393 teaches away from the present invention. At column 2, lines 47-56, Fredman '393 states:

"The most common used prepaid delivery system currently in use is Business Reply Mail offered by the United States Postal Service. As discussed earlier there is no expiration date for Business Reply Mail, accordingly there is no cost benefit for many Companies to provide this particular service to their regular bill paying customers. These customers are already obligated to pay their monthly bills to these companies. Accordingly for companies to provide Business Reply Mailing in its current form to customers would only add additional cost to the company's bottom line."

The alternative to Business Reply Mail is discussed in Fredman '393 at column 2, lines 57-65:

“With the Time Controlled Prepaid Delivery service that I propose, companies could choose based upon a cost-benefit analysis, whether of [sic] not to offer the benefit of time controlled prepaid postage/delivery to their customers. For companies that provide such service, their customers could choose whether or not to take advantage of prepaid postage and send an item prior to its postage’s predetermined expiration date or to send the item after the predetermined effective expiration date and pay for postage themselves.”

Clearly, Fredman '393 teaches away from the present invention and most importantly, nowhere in Fredman '393 is there a suggestion or teaching that a registration ID number is generated which corresponds to a delivery address; the registration number is transmitted to a data center; postage indicium is generated that is associated with this registration ID number and a delivery address; the postage indicium is transmitted to a postage metering system; and then the postage indicium information is printed on the associated business reply mail piece.

Appellant respectfully submits that these cited references do not render the invention as presently claimed obvious and are not properly combined. Accordingly, Appellant respectfully submits that the Examiner has not established a *prima facie* case of obviousness.

C. The subject matter defined by claims 7-8, 13-14, 17-18, 21, 23-24, 26, 32-33, 35, 37-38, 41 and 43-44 are not rendered obvious by Stier '218, Pintsov '889, Fredman '393 in view of Allott '565.

The Examiner relies on Allott '565 for teaching a method of delivering a business reply mail piece using expiring indicia. However, there is absolutely no suggestion in Allott '565 for a customer to contact a data center to obtain postal indicia information. The postal indicia in Allott '565 is already pre-printed on the envelope, the customer does not contact a data center to obtain postage indicium information. Further, there is absolutely no teaching or suggestion in Allott '565 of at least associating a registration ID number with a previously defined delivery

address; transmitting the registration ID number to a data center; generating the postal indicia information using the registration ID number; transmitting the postage indicium information to a postage metering system; and the printing the postage indicium information on an associated business reply mail piece. Thus, Appellant submits that these references are not properly combined to render the present invention obvious. Appellant respectfully submits that the Examiner may have used hindsight to solve the problem addressed by the present invention.

Hindsight reasoning is improper to fill in the gaps in the prior art. “It is improper, in determining whether a person of ordinary skill would have been led to this combination of references, simply to ‘[use] that which the inventor taught against its teacher.’” *In re Lee*, 277 F.3d at 1344 (citing *W. L. Gore v. Garlock, Inc.*, 721 F.2d 1540, 1553, 220 USPQ 303, 312-13 (Fed. Cir. 1983)). See also *In re Dembiczak*, 175 F.3d 994, 999-1000, 50 USPQ2d 1614 (Fed. Cir. 1999) (cautioning that “the very ease with which the invention can be understood may prompt one to ‘fall victim to the insidious effect of a hindsight syndrome.’”) (citing *W. L. Gore*, 721 F.2d 1540).

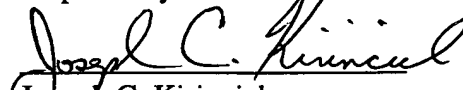
Without using the present claims as a road map, it would not have been obvious to make the multiple, selective modifications needed to arrive at the claimed invention from these references. The rejection uses impermissible hindsight to reconstruct the present invention from these references. See *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. App. 1985) (requiring “convincing line of reasoning” to support obviousness determination). The fact that the present invention was made by the Applicant does not make the present invention obvious, that suggestion or teaching must come from the prior art. See *C. R. Bard, Inc. v. M3 Systems, Inc.*, 157 F.3d 1340, 1352 (Fed. Cir. 1998). See, e.g., *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 1051 (Fed. Cir. 1988) (it is impermissible to reconstruct the claimed invention from selected pieces of prior art absent some suggestion, teaching or motivation in the prior art to do so). No such suggestion, teaching or motivation has been provided by the Examiner.

IX. CONCLUSION

For the reasons advanced above, Appellant respectfully submits that claims 1-26 and 28-44 are patentable. Reversals of the rejections by the Examiner are respectfully solicited.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph C. Kirincich", written over a horizontal line.

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APPENDIX A TO APPELLANT'S APPEAL BRIEF
CURRENT COPY OF THE CLAIMS ON APPEAL

1. A method of operating a postage metering system for printing a postage indicium for use with a business reply mail piece, the method comprising the step(s) of:

transmitting a registration ID number, provided by a mail campaign sender to a user, from the postage metering system to a data center, the registration ID number being associated with a delivery address previously defined by the mail campaign sender; receiving postage indicium information at the postage metering system from the data center, the postage indicium information generated using the registration ID number and including data relating to the delivery address; and printing the postage indicium on the business reply mail piece at the postage metering system using the postage indicium information.

2. The method of claim 1, further comprising the step(s) of:

printing the delivery address on the business reply mail piece at the postage metering system, where the delivery address has been selected, by the data center from a plurality of delivery addresses previously defined by the mail campaign sender, according to parameters associated with the user of the postage metering system that were previously established by the mail campaign sender.

3. The method of claim 2, further comprising the step(s) of:

receiving a subsidy provided by the data center to the user of the postage metering system for mailing the business reply mail piece.

4. A method of operating a data center for generating postage indicium information for use with printing a postage indicium on a business reply mail piece, the method comprising the step(s) of:

receiving a delivery address from a mail campaign sender corresponding to a mail campaign of which the business reply mail piece is a part;

generating a registration ID number corresponding to the delivery address;
providing the registration ID number to the mail campaign sender;
establishing a transaction session with a postage metering system;
receiving the registration ID number from the postage metering system, where the registration ID number was previously provided by the mail campaign sender to a user of the postage metering system;
generating the postage indicium information using the registration ID number and data relating to the delivery address; and
transmitting the postage indicium information to the postage metering system for use in printing the postage indicium on the business reply mail piece.

5. The method of claim 4, further comprising the step(s) of:

performing address hygiene on the delivery address; and
transmitting a hygiened addressed to the sender.

6. The method of claim 5, further comprising the step(s) of:

providing a subsidy to the user for mailing the business reply mail piece; and
charging the subsidy to the mail campaign sender.

7. The method of claim 6, further comprising the step(s) of:

receiving an expiration date from the mail campaign sender beyond which the business reply mail piece is no longer wanted by the mail campaign sender that is associated with the registration ID number; and
providing a warning to the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.

8. The method of claim 4, further comprising the step(s) of:

receiving an expiration date from the mail campaign sender beyond which the business reply mail piece is no longer wanted by the mail campaign sender that is associated with the registration ID number; and
providing a warning to the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.

9. A method of operating a business reply mail processing system by a mail campaign sender, the method comprising the step(s) of:

providing a delivery address, associated with a particular mail campaign which includes a business reply mail piece, to a data center;
receiving from the data center a registration ID number associated with the delivery address; and
supplying the registration ID number and the business reply mail piece to a user, where the registration ID number is used by the user to print a postal indicium on the business reply mail piece including data relating to the delivery address.

10. The method of claim 9, further comprising the step(s) of:

receiving from the data center a new hygiened address representing a version of the delivery address prior to supplying the registration ID number and the business reply mail piece to the user, where the new hygiened address is to be used as the delivery address.

11. The method of claim 10, further comprising the step(s) of:

printing the registration ID number on the business reply mail piece.

12. The method of claim 11, further comprising the step(s) of:

authorizing the data center to provide a subsidy to the user for mailing the business reply mail piece; and
authorizing the data center to charge the subsidy to the mail campaign sender.

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13. The method of claim 12, further comprising the step(s) of:

providing the data center with an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender that is associated with the registration ID number; and
authorizing the data center to warn the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.

14. The method of claim 9, further comprising the step(s) of:

providing the data center with an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender that is associated with the registration ID number; and
authorizing the data center to warn the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.

15. A memory device accessible by a computing system, the memory device comprising:

a plurality of mail campaign sender accounts associated with respective mail campaign senders, where each of the plurality of mail campaign sender accounts includes a registration ID number associated with a delivery address and a particular mail campaign of which a business reply mail piece is a part, respectively, and where said registration ID number is used to generate a postage indicium.

16. The memory device of claim 15, wherein:

at least one of the plurality of mail campaign sender accounts further includes an indication associated with the registration ID number to determine whether or not the respective mail campaign sender authorizes a subsidy to a user for mailing the business reply mail piece.

17. The memory device of claim 16, wherein:

at least one of the plurality of mail campaign sender accounts further includes an expiration date, beyond which the business reply mail piece is no longer wanted by

the mail campaign sender, associated with the registration ID number to determine whether or not to provide a warning to the user.

18. The memory device of claim 15, wherein:

at least one of the plurality of mail campaign sender accounts further includes an expiration date, beyond which the business reply mail piece is no longer wanted by the mail campaign sender, associated with the registration ID number to determine whether or not to provide a warning to the user.

19. A business reply mail piece, comprising:

a registration ID number printed thereon and wherein the registration ID number is associated with a mail campaign sender, a previously defined delivery address and a particular mail campaign of which the business reply mail piece is a part; and
a postage indicium generated using said registration ID number and including data relating to said previously defined delivery address.

20. The business reply mail piece of claim 19, wherein:

the previously defined delivery address is also printed thereon.

21. The method of claim 3, further comprising the step(s) of:

receiving the subsidy only if the business reply mail piece is posted within a specified time period defined by the mail campaign sender.

22. The method of claim 1, further comprising the step(s) of:

receiving a subsidy provided by the data center to the user of the postage metering system for mailing the business reply mail piece.

23. The method of claim 22, further comprising the step(s) of:

receiving the subsidy only if the business reply mail piece is posted within a specified time period defined by the mail campaign sender.

24. The method of claim 1, further comprising the step(s) of:

displaying a warning to the user if the user contacts the data center after an expiration date, defined by the mail campaign sender and beyond which the business reply mail piece is no longer wanted by the mail campaign sender, attempting to obtain postage for the business reply mail piece, where the expiration date is associated with the registration ID number.

25. The method of claim 4, further comprising the step(s) of:

providing a subsidy to the user for mailing the business reply mail piece; and
charging the subsidy to the mail campaign sender.

26. The method of claim 25, further comprising the step(s) of:

providing the subsidy only if the business reply mail piece is posted within a specified time period defined by the mail campaign sender.

27. (Canceled)

28. The method of claim 4, further comprising the step(s) of:

storing a plurality of delivery addresses previously defined by the mail campaign sender;
and
selecting the delivery address for the business reply mail piece from the plurality of delivery addresses according to parameters, previously established by the mail campaign sender, associated with the user of the postage metering system.

29. The method of claim 6, further comprising the step(s) of:

storing a plurality of delivery addresses previously defined by the mail campaign sender;
and
selecting the delivery address for the business reply mail piece from the plurality of delivery addresses according to parameters, previously established by the mail campaign sender, associated with the user of the postage metering system.

30. The method of claim 4, further comprising the step(s) of:
providing a notification to the mail campaign sender when business reply mail piece is posted by the user.
31. The method of claim 6, further comprising the step(s) of:
providing a notification to the mail campaign sender when the business reply mail piece is posted by the user.
32. The method of claim 12, further comprising the step(s) of:
specifying a time period in which the business reply mail piece must be posted to receive the subsidy; and
authorizing the data center to charge the subsidy to the mail campaign sender only if the business reply mail piece is posted within the specified time period.
33. The method of claim 9, further comprising the step(s) of:
specifying an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender; and
authorizing the data center to provide a warning to the user if the user contacts the data center after the expiration date attempting to obtain postage for the business reply mail piece.
34. The method of claim 9, further comprising the step(s) of:
defining a plurality of delivery addresses; and
establishing parameters for use in determining a selected one of the plurality of delivery address to use as the delivery address on the business reply mail piece, where the parameters are associated with the user of the postage metering system.
35. The memory device of claim 15, wherein:
some of the plurality of mail campaign sender accounts further include an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender.

36. The memory device of claim 15, wherein:

some of the plurality of mail campaign sender accounts further include: (i) a plurality of delivery addresses; and (ii) parameters for use in determining a selected one of the plurality of delivery address to use as the delivery address on the business reply mail piece, where the parameters are associated with the user of the postage metering system.

37. The memory device of claim 17, wherein:

some of the plurality of mail campaign sender accounts further include an expiration date beyond which the business reply mail piece is no longer wanted by the mail campaign sender.

38. The memory device of claim 17, wherein:

some of the plurality of mail campaign sender accounts further include: (i) a plurality of delivery addresses; and (ii) parameters for use in determining a selected one of the plurality of delivery address to use as the delivery address on the business reply mail piece, where the parameters are associated with the user of the postage metering system.

39. The method of claim 4, further comprising the step(s) of:

sending a message to the mail campaign sender indicating that the user has dispatched the business reply mail piece.

40. The method of claim 7, further comprising the step(s) of:

sending a message to the mail campaign sender indicating that the user has dispatched the business reply mail piece.

41. The method of claim 26, further comprising the step(s) of:

sending a message to the mail campaign sender indicating that the user has dispatched the business reply mail piece.

42. The method of claim 9, further comprising the step(s) of:
receiving a message from the data center indicating that the user has dispatched the
business reply mail piece.
43. The method of claim 14, further comprising the step(s) of:
receiving a message from the data center indicating that the user has dispatched the
business reply mail piece.
44. The method of claim 33, further comprising the step(s) of:
receiving a message from the data center indicating that the user has dispatched the
business reply mail piece.

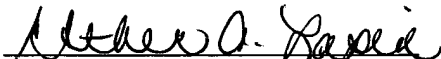
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:) Date: September 17, 2004
Frederick W. Ryan, Jr.) Attorney Docket No.: F-173
Serial No.: 09/626,954) Customer No.: 00919
Filed: July 27, 2000) Group Art Unit: 3629
Confirmation No.: 9430) Examiner: Richard Sukyoon Woo
Title: **POSTAGE METERING SYSTEM FOR USE WITH BUSINESS REPLY
MAIL**

TRANSMITTAL OF APPEAL BRIEF (PATENT APPLICATION 37 CFR 1.192)

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Sir:


Transmitted herewith in **triplicate** is the **APPEAL BRIEF** in the above-identified patent application with respect to the Notice of Appeal filed on July 19, 2004.

Pursuant to 37 CFR 1.17(c), the fee for filing the Appeal Brief is \$330.00. Please charge Deposit Account No. **16-1885** in the amount of \$330.00 to cover the above fees.

The Commissioner is hereby authorized to charge any additional fees which may be required to Deposit Account No. **16-1885**.

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Respectfully submitted,


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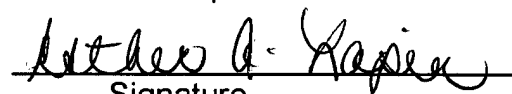
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